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WELLS FARGO BANK, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MOHAMMAD SUBHANI,

Plaintiff,

vs.

WELLS FARGO BANK, NATIONAL
ASSOCIATION an FDIC insured corporation
and does 1 through 100, inclusive,

Defendant.

Case No.: 3:12-cv-01755-MEJ

**STIPULATION TO CONTINUE
DEFENDANT'S DEADLINE TO
RESPOND TO COMPLAINT**

Complaint Date: March 8, 2012

WHEREAS, on March 8, 2012, plaintiff Mohammad Subhani ("Plaintiff") filed an initial complaint ("Complaint") in the Superior Court of the State of California, for the County of Contra Costa, Case No. C 12-00551 ("Action");

WHEREAS, on March 8, 2012, Plaintiff served the Complaint upon defendant Wells Fargo Bank, N.A. ("Wells Fargo");

WHEREAS, on April 9, 2012, Wells Fargo removed the Action to this Court;

WHEREAS, under the Federal Rules of Civil Procedure, Wells Fargo's initial deadline to answer or otherwise respond to the Complaint was April 16, 2012;

WHEREAS, Plaintiff agreed to extend the deadline for Wells Fargo to respond to the Complaint until April 30, 2012;

WHEREAS, the parties engaged in settlement discussions;

WHEREAS, Plaintiff agreed to extend the deadline for Wells Fargo to respond to the Complaint until May 14;

WHEREAS, the parties have come very near settlement;

WHEREAS, Plaintiff agreed to extend the deadline for Wells Fargo to respond to the Complaint until June 1, 2012;

WHEREAS, the parties agree that if settlement is not reached by June 1, the parties will not seek a further extension; and

NOW THEREFORE, IT IS HEREBY STIPULATED by the parties hereto, through their respective counsel, that:

1. The time for Wells Fargo to answer or otherwise respond to the Complaint shall be extended until and including June 1, 2012; and

2. This stipulation is without prejudice to the rights, claims, arguments and defenses of all parties.

DATED: May 10, 2012

SAGARIA LAW, P.C.

By: /s/ Elliott W. Gale
Elliot W. Gale

Attorneys for Plaintiff
Mohammad Subhani

DATED: May 10, 2012

SEVERSON & WERSON
A Professional Corporation

By: /s/ Alisa A. Givental
Alisa A. Givental

Attorneys for Defendant
Wells Fargo Bank, N.A.

1 Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest
2 under penalty of perjury that concurrence in the filing of the document has been obtained from
3 Elliott W. Gale.

4 /s/ Alisa A. Givental
5 Alisa A. Givental
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~~PROPOSED~~ ORDER

Pursuant to the stipulation of the parties and GOOD CAUSE APPEARING:

IT IS HEREBY ORDERED that the time for Wells Fargo to answer or otherwise respond to the Complaint shall be extended until and including June 1, 2012.

DATED: May 10, 2012



CHIEF MAGISTRATE JUDGE
MARIA-ELENA JAMES